

WORK ASSIGNMENT NO. 2-03
Technical/Regulatory Support for Subpart W of NESHAPs
WAM: Rosnick

PURPOSE AND SCOPE

SC&A is to provide technical and regulatory support to the EPA Office of Radiation and Indoor Air to develop a potential rulemaking to update the NESHAP Subpart W standard for radon emissions from operating uranium mill tailings impoundments which was promulgated on December 15, 1989 (40 CFR 61.250). Specifically, SC&A will continue the development of the draft Background Information Document (BID) in support of EPA's rulemaking efforts to determine if modification of Subpart W is warranted.

Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments do not exceed 20 pCi/m²/sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facilities' emissions. These sites include the mills regulated by the NRC and its Agreement States.

Section 112(q) of the Clean Air Act, as amended, further requires EPA to review, and if appropriate, revise or update the Subpart W standard on a timely basis (10-year interval). To date, EPA has not revisited this standard since its promulgation and now desires to do so.

TECHNICAL STATUS*Progress Made During Period:*

SC&A has initiated work on the Work Plan.

Difficulties Encountered and Remedial Action Taken:

None

Anticipated Activity Next Period:

SC&A will complete and submit the Work Plan and Cost Estimate.

Schedule of Deliverables Next Period:

Work Plan and Cost Estimate – not later than 4/16/11.

OUTSTANDING ACTIONS AWAITING CONTRACTING OFFICER AUTHORIZATION

None

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OVERALL FINANCIAL INFORMATION				
	<u>Current</u>		<u>Cumulative</u>	
	<u>Hours</u>	<u>Amount</u>	<u>Hours</u>	<u>Amount</u>
Amount Claimed	7.0	1,022.77	7.0	\$1,022.77
Amount Shown on Work Plan			354.0	\$44,340.00
Amount Paid				\$0.00
Amount Suspended				\$0.00
Amount Disallowed				\$0.00
Remaining Amount			347.0	\$43,317.23
Unbilled Allowable Costs		\$0.00		\$0.00
Labor Estimates for Next Period			60.0	\$7,500.00
Estimate to Complete			347.0	\$43,317.23
Estimated Percentage of Completion, based on LOE				2%

LABOR SUMMARY									
		<u>Current</u>		<u>Cumulative</u>		<u>Negotiated (Work Plan)</u>		<u>Remaining</u>	
		<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>	<u>Hours</u>	<u>Costs</u>
P4	SC&A	7.00	995.22	7.00	995.22	342.00	41,997.00	335.00	41,001.78
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P3	SC&A	0.00	0.00	0.00	0.00	12.00	1,218.00	12.00	1,218.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Technician	SC&A	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clerical	SC&A	0.00	0.00	0.00	0.00	16.00	1,012.00	16.00	1,012.00
	Sub	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		7.00	995.22	7.00	995.22	354.00	44,227.00	347.00	43,231.78
Average Hourly Rate (Labor)					\$142.17	\$124.94			

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ODC DETAIL INFORMATION		
Item	Current	Cumulative
Publications/Subscriptions	\$0.00	\$0.00
Computer Supplies/Usage	\$0.00	\$0.00
Meetings/Travel	\$0.00	\$0.00
Supplies/Materials	\$0.00	\$0.00
Reproduction/Graphics	\$0.00	\$0.00
Telephone/Fax	\$0.00	\$0.00
Typing/Clerical	\$0.00	\$0.00
Postage/Delivery	\$24.25	\$24.25
Other	\$0.00	\$0.00
TOTAL	\$24.25	\$24.25
Sub ODCs	-	-
Burden on ODCs (including Sub ODCs)	\$3.30	\$3.30

WORK HOUR DETAIL THIS PERIOD		
	Name	Hours
P-4 Labor	A. Zeitoun	1
	None	-
	None	-
	None	-
	None	-
	H. Pettengill	6
P-3 Labor	None	-
P-2 Labor	None	-
P-1 Labor	None	-
Technician Labor	None	-
Clerical Labor	None	-